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**BY ECF**

Hon. Lorna H. Schofield  
United States District Court  
Thurgood Marshall United States Courthouse  
40 Foley Square  
New York, NY 10007

**Re: US Airways, Inc., for American Airlines, Inc. as Successor and Real Party in Interest v. Sabre Holdings Corp., et al., No. 1:11-cv-02725-LGS  
Requests to File on CD, File Extended Declarations, and File Additional Exhibits;  
and Update on Briefing Schedule**

Dear Judge Schofield:

We write on behalf of Plaintiff US Airways, Inc. and its successor-in-interest, American Airlines ("US Airways"), in connection with US Airways' forthcoming Renewed and Amended Motion for Costs, Including Attorneys' Fees and Expenses, Under 15 U.S.C. § 15 (the "Motion").

Pursuant to Electronic Case Filing Rules & Instructions Section 5 and Your Honor's Individual Rules and Procedures for Civil Cases, we write to request to file on a compact disc ("CD") Excel spreadsheets and other invoices attached to declarations in support of the Motion detailing time entries, expenses, and costs. The spreadsheets contain too much data to be legibly converted to PDF files to file by ECF and the Court (and Sabre) cannot filter, sort, and analyze the data in PDF files. Similarly, the remaining invoices cannot be organized effectively on the docket and are better understood when organized by year in file folders. Your Honor and Judge Cott previously granted similar requests in connection with US Airways' 2017 and 2023 cost motions. See ECF Nos. 850, 899, 909, 1290. We will also be requesting to redact certain information to protect the confidentiality of US Airways' attorney and consultant time entries. We will file a redaction request concurrently with our motion, under Section (I)(D) of Your Honor's Individual Rules and Procedures for Civil Cases.

Additionally, pursuant to Rule (III)(B)(3) of Your Honor's Individual Rules and Procedures for Civil Cases, we request to file declarations in support of our motion with the Court of no more than thirty-five double-spaced pages and file no more than five additional exhibits. Given the extensive work for which US Airways is seeking to recover, thorough declarations and supporting exhibits are necessary to aid the Court in its decision. Your Honor and Judge Cott previously granted similar requests in connection with US Airways' 2017 and 2023 cost motions. See ECF Nos. 850, 1290.

Lastly, the parties have conferred again and agreed to an updated briefing schedule from the parties' initial proposed schedule submitted on September 4, 2024 (ECF No. 1325). The parties now propose that US Airways file its Motion on October 7, 2024, instead of October 4, to avoid the upcoming religious holiday. Sabre will file its opposition brief on or before November 21, 2024, and US Airways will file its reply brief on or before January 17, 2025.

Sabre does not object to any of the above requests.

Respectfully submitted,



Andrew J. Frackman  
Partner  
of O'MELVENY & MYERS LLP

cc: Counsel of record (by ECF)